



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

25 JAN 2011

REPLY TO THE ATTENTION OF:
(AR-18J)

Pete King III
Project Manager
Oneida Seven Generations Corporation
P.O. Box 257
Oneida, Wisconsin 54155

Dear Mr. King:

I am writing as a follow up to a December 22, 2010, electronic mail message to Daniel Guido, Environmental Resources Management, in which the U.S. Environmental Protection Agency requested further information about the Oneida Seven Generations Corporation (OSGC) Waste-to-Energy Facility. Before the OSGC public meeting about the facility on December 21, 2010, Mr. Guido discussed the project with EPA staff and showed an analysis of the project's potential to emit (PTE).

As we presently understand the pertinent facts, OSGC is constructing a waste-to-energy facility that consists of three pyrolysis ovens and four internal combustion engines generating 5-6 MW of electricity. At the present time, it is unclear whether OSGC's proposed waste-to-energy plant will require any Federal environmental permits under the Clean Air Act.

To further our understanding of the pertinent facts, I would appreciate if you could provide EPA with the following information:


- 1) An analysis of the proposed facility's PTE for all regulated Clean Air Act pollutants.
- 2) As described, the current project will accept 150 tons per day (tpd) of waste, which will feed three pyrolysis ovens. The site plan, however, shows that space has been designated for three additional ovens. Is the waste receiving and storage area already designed presently to accept and store 300 tpd of waste within the structure (waste sufficient to feed six ovens total)?
- 3) If and when three additional pyrolysis ovens are installed, would that include or require an increase in the amount of internal combustion engines used to produce electricity?

- 4) Are the synfuel storage tanks already designed to accommodate 300 tpd of production from the ovens?
- 5) Is an increase in production (i.e., additional ovens) and/or generating capacity above the 5-6 MW Wisconsin Public Service (WPS), the presumed buyer of the electric output, will be buying from OSGC already addressed in the contract between OSGC and WPS?
- 6) The pyrolysis ovens were described during the public meeting as operating year round, at an estimated 8760 hours/year. Is there any planned start up/shut down or maintenance periods planned once operation commences? Has an analysis of emissions during periods of start up/shut down been analyzed and included in the PTE calculations?
- 7) Is there a planned future increase in the amount of IC engines at the facility for generating electricity?
- 8) Are the cooling towers as currently planned already sized to accommodate an additional 150 tpd of waste processed if a future expansion were to occur?

As you are aware, it is the owner/operator's responsibility to apply for permit coverage under all applicable environmental statutes of the Clean Air Act. The Federal Prevention of Significant Deterioration (PSD) construction permitting program requires that an applicable new major source or major modification to an existing source receive a PSD permit prior to commencing construction under Title 40 Code of Federal Regulations Part 52.21.

We would appreciate receiving the above information within 30 days of your receipt of this letter. If you have any questions, please call feel free to contact Constantine Blathras, of my staff, at (312) 886-0671.

Sincerely yours,



Pamela Blakley, Chief
Air Permits Section

cc: Richard Hill, Chairman
Oneida Tribe of Indians of Wisconsin